

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

GINA GARZA,

Plaintiff,

v.

RYAN WILLIAMS,

Defendant.

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**CIVIL ACTION NO.
4:23-cv-03509**

JURY REQUESTED

STIPULATION

Comes Not Plaintiff GINA GARZA and Defendant RYAN WILLIAMS before
commencement of trial and hereby make the following stipulations:

1. For purposes of these stipulations “occurrence in question” is defined as the incident hat occurred on June 29, 2021, when Defendant Ryan Williams ran a red light and struck Plaintiff Gina Garza’s vehicle.
2. The jury shall be instructed that Plaintiff Gina Garza’s expenses for the treatment provided in the following medical records was reasonable:
 - a. Glenn J. Bricken & Associates
 - b. HCA Houston Healthcare Northwest
 - c. Houston Medical Imaging
 - d. Minvasive Pain & Orthopedics
 - e. Next Level Urgent Care
 - f. Select Physical Therapy
 - g. Townsen Memorial Imaging Katy
3. The following medical records and diagnostic imaging studies shall be admitted into evidence subject to redaction for references to personal identifying information insurance, alleged guarantors, billing responsibilities, and billing and payment:
 - a. Glenn J. Bricken & Associates
 - b. HCA Houston Healthcare Northwest
 - c. Houston Medical Imaging

- d. Minivasive Pain & Orthopedics
 - e. Next Level Urgent Care
 - f. Select Physical Therapy
 - g. Townsen Memorial Imaging Katy
4. The final judgment, if any, shall include an amount for the element of damages of reasonable and necessary past medical expenses of \$29,312.43 that was the result of and proximately caused by the occurrence in question. This amount of past medical is agreed and shall not be submitted to the jury.

Respectfully submitted,

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**ATTORNEYS FOR DEFENDANT RYAN
WILLIAMS**

CERTIFICATE OF SERVICE

I certify that a true and correct copy of this document was sent to all known counsel of record pursuant to the Federal Rules of Civil Procedure on the 9th day of December 2024.

/S/ Richard Morrison

Richard Morrison

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